

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FALENCIA A. FAIR,	)	Case No. 1:19-cv-01181-SO
	)	
Plaintiff,	)	Judge Christopher A. Boyko
	)	Magistrate Judge William H. Baughman, Jr.
v.	)	
	)	<b><u>CARYN GROEDEL &amp; ASSOCIATES CO.,</u></b>
THE OHIO BELL TELEPHONE COMPANY,	)	<b><u>LPA'S RESPONSE TO PLAINTIFF'S</u></b>
	)	<b><u>OPPOSITION TO MOTION TO WITHDRAW</u></b>
Defendant.	)	<b><u>AS COUNSEL FOR PLAINTIFF</u></b>

On February 28, 2020, the Court appointed Caryn Groedel & Associates Co., LPA ("CG&A") to represent Plaintiff, who had commenced this refiled case *pro se*. (Doc # 17.)

Since then, CG&A has, on Plaintiff's behalf, *inter alia*: amended Plaintiff's Complaint; prepared Plaintiff's supplemental disclosures; negotiated a Stipulated Protective Order; propounded written discovery requests upon Defendant; assisted Plaintiff in preparing her responses to Defendant's discovery requests; reviewed the thousands of documents Plaintiff produced; reviewed the *tens of thousands* of documents Defendant produced; prepared Plaintiff for her deposition; defended Plaintiff in her deposition; transmitted several written communications to defense counsel regarding paper discovery issues; met and conferred telephonically with defense counsel regarding paper discovery; and exchanged numerous communications with Plaintiff regarding various aspects of this case.

Unfortunately, irreconcilable differences have arisen between Plaintiff and her counsel. To protect Plaintiff's interests in this case and ensure compliance with the Code of Professional Conduct, CG&A will limit its explanation of the issues to the following:

Plaintiff and CG&A have conflicting views on, among other things: the manner in which to proceed, strategy, the legal issues in this case, and the economic issues in this case.

These conflicting views, and differences in understanding, have impeded CG&A's ability to sharpen the issues and continue moving this case forward.

In an effort to achieve a mutual understanding and common ground, CG&A has communicated with Plaintiff at length regarding the above items, but there is still no mutuality or agreement on a plan for moving forward, resulting in irreconcilable differences.

Respectfully submitted,

/s/ Matthew S. Grimsley

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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 11th day of August, 2021, a copy of the foregoing was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. A copy of the foregoing was also sent by email and certified mail (#7011 2970 0002 8905 9286) to Plaintiff, Falencia Fair, 5948 Marra Drive, Bedford Heights, OH 44146.

/s/ Matthew S. Grimsley

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